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May 13, 2024

VIA ECF

Hon. Kenneth M. Karas
United States District Court
Southern District of New York
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601-4150

Re: *Brown v. Arrow Electronics, Inc.*
Case No. 7:23-cv-05055(KMK)

Dear Judge Karas:

We represent the Defendant, Arrow Electronics, Inc., in the above-referenced matter ("Defendant"). We write jointly with Plaintiff's counsel to respectfully request that the deadline to complete discovery (and all subsequent deadlines) in this case be extended by sixty (60) days.

Pursuant to Your Honor's Individual Rules, Section 1, C: (1) the original date for the Parties to complete fact discovery is currently June 14, 2024; (2)-(3) there have been no prior requests for adjournment or extension, and (4) this is a joint request on behalf of the parties.

The Parties request this extension for the following reasons. First, this case requires the exchange of ESI which is time consuming in the gathering and production process. Currently, Defendant is having technical issues uploading a large ESI data set to a third-party vendor. We are working diligently with the third-party vendor to resolve these difficulties as quickly as we can. Second, the claims in this case relate to disability discrimination relating to Plaintiff's physical condition. Defendant had sent correspondences to third-party providers for Plaintiff's medical records immediately once Defendant received Plaintiff's authorizations. However, her medical records are still pending. These documents are necessary for Defendant to conduct Plaintiff's deposition.

As such, we respectfully request that completion of fact discovery be extended from June 14, 2024, to August 14, 2024 and all subsequent deadlines be extended by 60 days.

<u>Discovery Item</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Fact Discovery	June 14, 2024	August 14, 2024

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Depositions	June 14, 2024	August 14, 2024
Requests to Admit	May 14, 2024	July 15, 2024
Plaintiff's expert disclosures and depositions	August 14, 2024	October 14, 2024
Defendant's expert disclosures and depositions	August 14, 2024	October 14, 2024

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ John J. Porta

John J. Porta

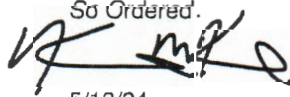
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cc: All Counsel of Record (via ECF)

4889-5521-6316, v. 1

Granted. The case management conference is moved to 11/19/24. The pre-motion letter deadlines are moved accordingly. at 11:30 via teleconference

So Ordered.



5/13/24